



CITY OF FAITH

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October 10, 2017

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington DC 20554

Re: Reply Comment on Rate-of-Return Study Areas with Potentially 100 Percent Overlapped by
Unsubsidized Competitors

Dear Ms. Dortch,

On August 11, 2017, the Federal Communications Commission (Commission) released a Public Notice in which the Wireline Competition Bureau (Bureau) published a list of study areas potentially subject to the 100 percent overlap rule. The Commission seeks comment on whether the competitors in the study area codes (SACs) listed are offering voice and broadband to 100 percent of locations in the relevant census blocks meeting the requirements in 47 CFR § 54.319(a). The Commission has defined an unsubsidized competitor as “a facilities-based provider of residential fixed voice and broadband service that does not receive high-cost support.”

Using Form 477 data from June 30, 2016, the Commission identified 13 rate-of-return study areas listed as potentially 100% overlapped by an unsubsidized competitor or combination of unsubsidized competitors. In the list, the Bureau listed Faith Municipal Telephone Company (Faith), SAC 391653 as one such area and identified Golden West Telecommunications Cooperative, Inc. (Golden West) as a competitive provider. Golden West provides service in areas outside the town of Faith but does not provide service within Faith’s service area, which is within the town of Faith itself (see Golden West letter filed October 10, 2017).

Since only Faith Municipal Telephone Company provides service within the town of Faith, Faith refutes the Bureau’s preliminary finding of 100% competitive overlap in Faith’s study area.

Sincerely,

Debbie Brown
General Manager
Faith Municipal Telephone Company